

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 97-CR-98

RANDY M. YAGER,

Defendant.

**UNITED STATES' MOTION FOR EXTENSION OF TIME
TO FILE COMPATONATE RELEASE RESPONSE**

The United States of America, by its attorneys, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin and Carol L. Kraft, Assistant United States Attorney, hereby moves the Court for an order extending the original fourteen day time period for the United States to respond to the defendant's motion for compassionate release, which he filed on August 31, 2020, pursuant to 18 U.S.C. §3582(c)(1)(A).

As grounds, undersigned counsel represents that she is lead attorney for this case and was out of the office on annual leave from August 31 through September 7, 2020. Accordingly undersigned counsel was not present when the defendant filed his motion and did not have reasonable access to its content until returning to the office on today's date.

Additionally, counsel for the defendant did not serve the government with the motion and its supporting exhibits, and as the result of the Court's order restricting access to the exhibits, neither undersigned counsel nor co-counsel who have previously appeared on this case have been able to access the exhibits on the District Clerk of Courts ECF system.

Based on the foregoing, the United States respectfully asks the Court to extend its response deadline to Tuesday, September 22, 2020, and to order the Clerk of Court to lift the restriction on the defendant's supporting exhibits so as to allow undersigned counsel and Assistant United States Attorneys Laura Kwaterski and Scott Campbell to access these documents.

Dated at Milwaukee, Wisconsin, September 8, 2020.

Respectfully submitted,

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By:

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